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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CARDINAL MANAGEMENT, INC., AND DAKOTA GLOBAL INVESTMENTS, LTD.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04287 (SMB)

STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING PRETRIAL CONFERENCE IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants Cardinal Management, Inc. ("Cardinal Management") and Dakota Global Investments, Ltd. ("Dakota") (collectively "Defendants") may move, answer or otherwise respond to the complaint (the "Complaint") filed in the above-captioned adversary proceeding is extended up to and including July 11, 2014. The pre-trial conference will be adjourned from June 25, 2014 to July 18, 2014 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

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This stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 5600) in the above-captioned case (No. 08-01789 (SMB)).

Dated: New York, New York June 10, 2014

BAKER & HOSTETLER LLP

By: _/s/ Elizabeth A. Scully_

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